

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

PRINCIPLE ENTERPRISES, LLC,

Plaintiff,

v.

TILDEN MARCELLUS, LLC,  
ROCKDALE MARCELLUS, LLC,  
EDWARD J. HEBERT, AND  
THOMAS C. STREETER,

Defendants.

No.: 4:21cv1115

Judge Matthew W. Brann

**JOINT MOTION TO STAY PENDING RESOLUTION OF  
BANKRUPTCY ADVERSARY PROCEEDINGS**

Plaintiff Principle Enterprises, LLC (“Principle”), Defendants Tilden Marcellus, LLC (“Tilden”), Rockdale Marcellus, LLC (“Rockdale”), Edward J. Hebert (“Hebert”) and Thomas C. Streeter (“Streeter”) (collectively, the “Parties”), by and through their undersigned counsel, jointly files this Motion to Stay (“Motion”) and, in support, states as follows:

1. On September 21, 2021, Rockdale filed a voluntary Chapter 11 bankruptcy petition in the Bankruptcy Court, docketed at Case No. 21-22080. *See* Dkt. 21.
2. On October 4, 2021, Principle has filed a motion for leave to amend its complaint. *See* Dkt. 26.

3. On October 29, 2021, Rockdale and Hebert and Streeter opposed the motion, at least in part, on the basis that the proposed amended complaint violated the automatic stay afforded by Rockdale's bankruptcy filing. *See* Dkt. 34, 35.

4. On October 29, 2021, Tilden filed a joinder in the oppositions of Rockdale and Hebert and Streeter to Principle's motion. *See* Dkt. 37.

5. On November 8, 2021, Rockdale, along with its sole shareholder Rockdale Marcellus Holdings, LLC (collectively "Debtors"), filed a complaint commencing an adversary proceeding in the Bankruptcy Court, as well as a motion for preliminary injunction seeking to enjoin further litigation of this case.

6. On November 9, 2021, as a result of the above, the Parties conferred and jointly agreed to a thirty-five day (35) stay of the above litigation.

7. Good cause exists to grant this motion as a stay will not prejudice any of the litigants and would promote judicial economy by allowing the parties to confer regarding possible resolutions for (a) the adversary proceeding and (b) the dispute regarding proposed amended complaint.

8. As such, the Parties request that this Court stay this case for thirty-five (35) days.

WHEREFORE, for the foregoing reasons, the Parties requests that the Court grant the Motion and stay this case.

DATED: November 11, 2021

Respectfully submitted,

/s/ Megan S. Haines

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